

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

PABLO FIGUEROA PAGAN
MARIA M. ROSARIO COTTO
DEBTOR(S)

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CASE NO. 09-08449-ESL

CHAPTER 13

**MOTION AND NOTICE OF FILING OF POST-CONFIRMATION
MODIFICATION OF CHAPTER 13 PLAN**

TO THE HONORABLE COURT:

NOW COME, PABLO FIGUEROA PAGAN AND MARIA M. ROSARIO COTTO,
through the undersigned attorney, and very respectfully state and pray as follows:

1. Debtors are hereby submitting a Post-confirmation Modification of Chapter 13 Plan,
dated January 19, 2010, herewith and attached to this motion.

NOTICE TO CREDITORS AND PARTIES IN INTEREST

NOTICE IS HEREBY GIVEN, that debtors proposed post-confirmation Plan is hereby
circulated to all creditors and parties in interest. You are hereby notified that you have twenty (20)
days to reject the proposed modification of this Plan and request a hearing.

I CERTIFY that on this same date a copy of this notice was sent by the Clerk of the Court
using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also
certify that I have mailed by United States Postal Service copy of this motion to the following non
CM/ECF participants: debtors, Pablo Figueroa Pagan and Maria M. Rosario Cotto; and to all
creditors and parties in interest, in the present case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 19th day of January,
2010.

/s/ Roberto Figueroa Carrasquillo
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United States Bankruptcy Court
District of Puerto Rico

IN RE:

Case No. **09-08449-13****FIGUEROA PAGAN, PABLO & ROSARIO COTTO, MARIA MERCEDES**Chapter **13**

Debtor(s)

CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: 1/19/2010 <input type="checkbox"/> AMENDED PLAN DATED: _____ <input type="checkbox"/> PRE <input checked="" type="checkbox"/> POST-CONFIRMATION Filed by: <input type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other	
I. PAYMENT PLAN SCHEDULE \$ 300.00 x 60 = \$ 18,000.00 \$ _____ x _____ = \$ _____ \$ _____ x _____ = \$ _____ \$ _____ x _____ = \$ _____ \$ _____ x _____ = \$ _____ TOTAL: \$ 18,000.00 Additional Payments: \$ _____ to be paid as a LUMP SUM within _____ with proceeds to come from: <input type="checkbox"/> Sale of Property identified as follows: _____ <input type="checkbox"/> Other: _____ Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____ PROPOSED BASE: \$ 18,000.00 III. ATTORNEY'S FEES (Treated as § 507 Priorities) Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ 2,874.00 Signed: <u>/s/ PABLO FIGUEROA PAGAN</u> Debtor <u>/s/ MARIA MERCEDES ROSARIO COTTO</u> Joint Debtor	II. DISBURSEMENT SCHEDULE A. ADEQUATE PROTECTION PAYMENTS OR \$ _____ B. SECURED CLAIMS: <input type="checkbox"/> Debtor represents no secured claims. <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows: 1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS: Cr. DORAL FINANCIAL Cr. _____ Cr. _____ # 8933006767254 # _____ # _____ \$ 2,044.01 \$ _____ \$ _____ 2. <input checked="" type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. CRIM Cr. _____ Cr. _____ # XXX-XX-2511 # _____ # _____ \$ 1,356.24 \$ _____ \$ _____ 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 4. <input checked="" type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: EUROBANK-LEASE 5. <input type="checkbox"/> Other: _____ 6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to: DORAL FINANCIAL C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2) D. UNSECURED CLAIMS: Plan <input checked="" type="checkbox"/> Classifies <input type="checkbox"/> Does not Classify Claims. 1. (a) Class A: <input checked="" type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input checked="" type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ Cr. COOP A/C CIDRENA Cr. _____ Cr. _____ # 1111804232008 # _____ # _____ \$ 5,746.12 \$ _____ \$ _____ 2. Unsecured Claims otherwise receive PRO-RATA disbursements. OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.) Debtor(s) reject contract lease with EUROBANK (account-3953). *Or as otherwise specified on proof of claim. Late filed claims filed by creditors will receive no distribution. "Surrenders collateral": Shares/savings in any Cooperativa/Association/Bank. Debtor reserves the right to object claims after plan confirmation.

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